

## **Recommendation 2: Resources and CREZ**

### **A. BLM's Solar Programmatic Environmental Impact Statement**

#### **1) RETI Issue Area**

*BLM's Solar Programmatic Environmental Impact Statement (PEIS)*

#### **2) Goals**

Ensure that the Solar PEIS, which will likely influence the location and timing of renewable generation in California, benefits from and reflects, as appropriate, the objective analysis and broad stakeholder input provided by RETI and is coordinated with transmission planning.

#### **3) Activity**

- (1) Form a RETI working group to track the Solar PEIS (in collaboration with work to track DRECP), keep the SSC updated, and draft RETI comments/input on Solar PEIS work for SSC review and approval. RETI's comments would focus on issues related to RETI's work and mandate.
- (2) Following the adoption of final PEIS, consider whether updates to RETI's CREZs are necessary to reflect PEIS land use determinations and priorities.

#### **3) Participants**

Voluntary RETI working group, composed of SSC members and other interested participants, who report regularly to and draft comments for the SSC. The SSC will also request regular updates on the Solar PEIS from BLM's representative on the SSC.

#### **4) Schedule and Deliverables**

The RETI working group would participate in meetings and review documents as scheduled and made available by the REAT, and would meet to collaborate as needed to draft comments for the SSC's review. The current Solar PEIS schedule (subject to change), which would drive the time required of the working group:

Summer 2010 – Draft PEIS

Spring 2011 – Final PEIS and ROD

#### **5) Detailed description of activity**

The Energy Policy Act of 2005 directed the Secretary of the Interior to plan for installing at least 10,000 megawatts of renewable energy on public lands in 6 western states. On May 29, 2008, BLM and DOE announced plans for a PEIS for development of large-scale solar electric facilities in 6 western states. The federal agencies are evaluating whether to establish environmental policies and mitigation strategies for all future solar energy facility development on BLM lands and for all US DOE funded solar facilities. On June 29, 2009, 24 solar study areas were added to the scope of the Solar PEIS; these study areas may be designated later as solar energy zones. Projects within the designated solar energy zones would receive expedited environmental review.

The Solar PEIS has had two scoping periods, and a number of individual organizations represented on the RETI SSC submitted comments. In addition, the CEC conducts an interagency working group of California federal, state, and local government agencies – many of whom are also represented on the RETI SSC – that reviews and comments on pre-public-release draft chapters of the Solar PEIS, having signed confidentiality agreements with BLM. Between November 2009 and August 2010, this interagency working group will be reviewing and commenting on pre-public drafts of the PEIS.

Schedule (subject to change):      Summer 2010 – Draft PEIS  
   Spring 2011 – Final PEIS and ROD

We envision a two-way flow of information between BLM and RETI, and recommend particular steps to implement that flow:

- 1.) **From RETI to the Solar PEIS**, per indications from BLM and DOI staff, since the inception of the solar PEIS, that they intend to make use of RETI's work; we understand that the designation of the solar study areas in California was informed by RETI's CREZ designations.
  - **Recommendation:** Form a RETI SSC working group to follow the Solar PEIS process and draft RETI written input on the draft Solar PEIS proposed to be released in August 2010. The SSC would review and approve the comments prior to submittal to BLM. Again, individual SSC members may submit comments individually to the BLM. The broad membership of RETI's SSC, however, may give greater weight to comments that come from the SSC as a whole, and the process of developing the comments jointly may help to build stakeholder consensus and spark creative solutions.
- 2.) **From Solar PEIS to RETI**, per the recommendations of the RETI SSC in its Phase 2A report (Section 1.6 and others), that RETI should update its CREZ and conceptual plan information based on the results of the Solar PEIS, perhaps in mid-2011.
  - **Recommendation:** RETI should update its CREZ and conceptual plan information based on the results of the solar PEIS, perhaps in mid-2011 and subsequently thereafter to reflect appropriate Solar PEIS final products (overlap with plans for updating RETI, drafted by others). The SSC will also request regular updates at SSC meetings from the BLM's representatives on the SSC.

## **B. Desert Renewable Energy Conservation Plan**

### **1) RETI issue area**

*Desert Renewable Energy Conservation Plan (DRECP)*

### **2) Goals**

Ensure that the DRECP, which will likely influence the location and timing of renewable generation in California, benefits from and reflects, as appropriate, the objective analysis and broad stakeholder input provided by RETI, and is coordinated with transmission planning.

### **3) Activity**

- (1) Form a RETI working group to track the DRECP (in collaboration with work to track Solar PEIS), keep the SSC updated, and draft RETI comments/input on DRECP work for SSC review and approval. RETI's comments would focus on issues related to RETI's work and mandate
- (2) Following the adoption of final DRECP, consider whether updates to RETI's CREZs are necessary to reflect DRECP land use determinations and priorities.

### **4) Participants**

Voluntary RETI working group, composed of SSC members and other interested participants, who report regularly to and draft comments for the SSC. The SSC will also request regular updates from SSC members of the Renewable Energy Action Team (REAT) that coordinates the DRECP, including DFG, CEC, and BLM.

### **5) Schedule and Deliverables**

The RETI working group would participate in meetings and review documents as scheduled and made available by the REAT, and would meet to collaborate as needed to draft comments for the SSC's review. The current DRECP schedule, which would drive the time required of the working group:

Q1 2010 – Final Best Management Practices (BMPs) Manual

Q1 2010 – Draft conservation strategy

December 2010 – Draft DRECP

June 2012 – Final DRECP

\* **Immediate opportunity**: BLM plans to align the mitigation requirements it adopts for CA in its solar PEIS with the REAT's BMPs, and will be reviewing and looking for issues that rise to the top in party comments on BMPs. Can SSC provide comments by 11/20/09 deadline?

### **6) Detailed description of activity**

Executive Order S-14-08 directs REAT (Renewable Energy Action Team: BLM, USFWS, DFG, and CEC) to develop a DRECP for the Mojave and Colorado Desert regions. The Plan will identify geographic areas designated for RPS project development and areas for conservation and declining species management. REAT held workshops on June 18 and Oct

13, 2009. REAT has been tasked with 1) developing DRECP planning agreement; 2) obtaining stakeholder and scientific input; 3) developing Draft DRECP conservation strategy by Dec. 2009; 4) developing draft DRECP by Dec. 2010; 5) completing final Draft DRECP environmental review and approval by June 2012; and 6) publishing Best Management Practices (BMPs) Manual by Dec. 2009.

We envision a two-way flow of information between the REAT and RETI, and recommend particular steps to implement that flow:

1.) **From RETI to REAT**, per Order #17 in Executive Order S-14-08: *“In conjunction with its work with DFG to develop the DRECP pursuant to number 7 above and any work it performs to facilitate the siting and permitting of renewable generation and transmission projects, the CEC shall coordinate with BLM, CPUC, the California ISO, and other interested federal, state, and local agencies, work closely with interested stakeholders, and utilize input from RETI.”*

→ **Recommendation:** Form a RETI SSC working group to provide input to the REAT on DRECP work products including the conservation strategy in December 2009, the draft DRECP in late 2010, and the DRECP environmental process and document. The working group would also track the DRECP’s use of information produced by RETI, providing input as needed on whether the use is accurate and appropriate. The SSC would review and approve the working group input prior to submittal to REAT. Of course, individual SSC members may submit comments individually to the REAT. The broad membership of RETI’s SSC, however, may result in greater weight being given to comments that come from the SSC as a whole, and the process of developing the comments jointly may help to build stakeholder consensus and spark creative solutions.

2.) **From REAT to RETI**, per the recommendations of the RETI SSC in its Phase 2A report (Section 1.6 and others), that RETI should update its CREZ and conceptual plan information based on the results of the DRECP, perhaps in mid-2011.

→ **Recommendation:** RETI should update its CREZ and conceptual plan information based on the results of the DRECP, perhaps in mid-2011 and subsequently thereafter to reflect appropriate DRECP final products (overlap with plans for updating RETI, drafted by others). The SSC will also request regular updates at SSC meetings from REAT member agencies.